



February 20, 2012

*Filed via ECFS*

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

*Re: Notice of Ex Parte - Structure and Practices of the Video Relay Service Program, CG Docket No. 10-51 and Telecommunications Relay Service and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123*

Dear Ms. Dortch:

On February 13, 2012, Thomas W. Kielty, President and Chief Executive Officer of Snap Telecommunications, Inc. (Snap!VRS), and the undersigned participated in a three-hour roundtable discussion at the invitation of the Commission in regards to its Further Notice of Proposed Rulemaking ("FNPRM"), released on December 15, 2011 in the above named docket. The Commission's FNPRM raised numerous complex and interrelated questions about its proposal for reform of the Video Relay Service ("VRS") regulatory framework with a very short timeframe for comment and reply comment. It must be noted that this FNPRM was not fully rendered into American Sign Language ("ASL") for the benefit of VRS consumers impacted by this proceeding – rather, a series of interpretative videos were provided. VRS consumers deserve the same degree of participation in Commission reform and rulemaking afforded to the general public under the current Administration.

Snap!VRS fully supports the Commission's efforts toward VRS reform, specifically, to achieve greater functional equivalency, provide access to broadband services and equipment, develop interoperability standards, collect relevant data, and ensure high quality services. Snap!VRS is of the opinion that the Commission would best advance VRS reform efforts by placing primary focus on the aforementioned areas prior to consideration of proposed methodologies and modifications to VRS compensation rates. That the Commission put forth a single per-user model to the obvious absence of others flies in the face of common sense and clearly points to the need for the Commission to engage in extensive dialogue and collaboration with VRS stakeholders – consumers and providers alike – for exploration of VRS reform issues including other compensation models that would both achieve the functional equivalency mandate of the TRS program and uphold the integrity of the TRS fund.

Lastly, Snap!VRS strongly supports the *Motion for Extension of Time* filed by Consumer Groups on February 13, 2012, requesting a two-week extension of the comment deadline until March 16, 2012 and an extension of the reply comment deadline until April 16, 2012. In fact, Snap!VRS believes that this request is quite modest in light of the need for in-depth stakeholder dialogue and collaboration to enable successful VRS reform efforts.

Sincerely,

/s/  
Nancy J. Bloch  
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cc: Thomas W. Kielty, President and Chief Executive Officer